

December 24, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Special Temporary Authority to Operate Intelsat 7 at 18.2° W.L.; Call Sign: S2229

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to operate Intelsat 7 (S2229) at 18.2° W.L. in the TT&C frequencies 13998 MHz (RHCP), 11451 MHz (H, LHCP), and 11453 MHz (V, LHCP), as well as the communications frequencies 3400 – 3625 MHz and 6425 – 6650 MHz.² Intelsat 7 will temporarily be collocated with the Intelsat 901 satellite, which currently operates at the 18.0° W.L. orbital location.³ Intelsat seeks this STA in order to provide additional capacity at 18.2° W.L.

Intelsat 7 is permanently licensed at 68.65° E.L.⁴ The satellite arrived on-station at 18.2° W.L. on December 3, 2014. Intelsat will operate Intelsat 7 at 18.2° W.L. in conformance with its coordination agreements related to the nominal 18.0° W.L. location or on a non-interference, non-protected basis. Additionally, Intelsat agrees to operate Intelsat 7 at 18.2° W.L. in accordance with the relevant frequency-related conditions in the Commission’s 2004 order granting authority for the Intelsat 7 satellite to operate at 68.5° E.L.⁵

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$930.00 filing fee electronically via the International Bureau's Filing System.

² Although Intelsat 7 also includes the bands 3625 – 3700 MHz, 10950 – 11200 MHz, 11450 – 11700 MHz, 13750 – 14000 MHz, and 14000 – 14250 MHz, Intelsat is not seeking authority to operate in these bands in this request.

³ See *The Applications of Intelsat LLC For Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, File Nos: SAT-A/O-20000119-00002 to SAT-A/O-20000119-00018; SAT-AMD-20000119-00029 to SAT-AMD-20000119-00041; and SAT-LOA-20000119-00019 to SAT-LOA-20000119-00028 (2000).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Mar. 21, 2014) (Public Notice).

⁵ See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Hybrid Communications Satellite Known at 68.5° E.L.*, Order and Authorization, 19 FCC Rcd 6137, File Nos. SAT-LOA-19960202-00017, SAT-AMD-19960411-0055, SAT-AMD-19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162 (2004). Intelsat 7’s location subsequently was changed to 68.65° E.L. See *supra* n.4.

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Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 7 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁶

Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 7 at 18.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 7 at 18.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 7 at 18.2° W.L. will provide additional capacity at that location. Accordingly, grant of this STA request is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁶ At the nominal 18.0° W.L. orbital location, Intelsat 7 will be collocated with the Intelsat 901 satellite. Intelsat 7 and Intelsat 901 will operate in separate station keeping boxes, and Intelsat will coordinate their operations internally.